



ALTECH ENVIRONMENTAL SERVICES, INC.

US EPA RECORDS CENTER REGION 5



503911

13 Jun 2002

Ross E. Powers

Brownfields Coordinator

U.S. Environmental Protection Agency Region 5

Emergency and Environmental Response Branch

9311 Groh Road

Grosse Ile, MI 48138-1697

Subject: **REVIEW OF REMOVAL ACTION FINAL REPORT**

MichCon MGP

South Green Avenue, Detroit, Michigan

Technical Direction Document No. S05-0105-017

Tetra Tech Contract No. 68-W-00-129

Dear Mr. Powers:

Altech Environmental Services, Inc. (Altech), has completed its review of the "Removal Action Final Report" for the Michigan Consolidated Gas Company (MichCon) Manufactured Gas Plant (MGP) potentially responsible party removal at the South Green Avenue site in Detroit, Michigan. Altech is a subcontractor to Tetra Tech EM Inc. (Tetra Tech), a member of the U.S. Environmental Protection Agency (U.S. EPA) Region 5 Superfund Technical Assessment and Response Team (START). As part of the team that provided oversight support to U.S. EPA at the South Green Avenue site, Altech was asked to review the final report for the removal action.

The final report was prepared by MichCon and is dated 11 Apr 2002. The final report documents the removal action activities from the kickoff meeting through completion of the field activities and outlines monitoring well abandonment plans. Altech's review of the final report focused primarily on the specific remedial procedures identified in the engineering evaluation/cost analysis and the removal action work plan. Altech's review comments are presented below.

1. *Section 5.0 Removal Action Scope of Work*

5.1 Permits

- i. Page 11. The bulleted list of permits and permit modifications should include the permit number and the date of issuance for each item listed.

5.7 Dust Control and Ambient Air Monitoring

- i. Page 19, Paragraph 2. The descriptions of the ambient air monitoring locations presented in bullet format should be consistent with the descriptions used in the analytical data. For example, the identifiers "Green/Tracks", "Post/Tracks", "Power Line East" and "Power Line West" are used in the analytical data but not in the text.

- ii. Page 19, Paragraph 2, Bullet 2. The location of monitoring well MW-3 is not shown in Figure 6 as indicated in the bullet. Figure 6 should be revised to show this well location.
- iii. Page 21, Paragraph 9. The first bulleted item indicates that volatile organic compound (VOC) concentrations in ambient air ranged from 0.0 to 0.5 part per million (ppm). However, IT Corporation's on-site ambient air monitoring records show maximum VOC concentrations of 23.0 ppm on 07 Sep 2001. The text should be revised for accuracy. Also, the text should discuss the VOC concentration peaks indicated in IT's on-site ambient air monitoring records that exceeded the action level of 10.0 ppm.

5.9 Transportation/Disposal of Excavated Materials

- i. Page 23, Paragraph 4. The transportation and disposal of the three 5-gallon pails containing tar-like material that are mentioned in Section 5.6.2, Paragraph 1, should be discussed in addition to the 25 drum remnants containing a tar-like substance.

5.13 Backfilling and Site Restoration

- i. The unapproved backfill material from London Aggregate that was stockpiled on the north side of the site during the earlier part of the excavation activities should be discussed in Section 5.13. The backfill

material was not approved by U.S. EPA and the City of Detroit after they reviewed the material sample analytical data.

5.14 Removal of Monitoring Wells

- i. The present condition of the monitoring wells remaining on site should be discussed in Section 5.14. For example, monitoring well MW-9 was damaged during excavation and removal of the unapproved backfill material stockpiled, and the present condition of this well should be described.

2. *Section 6.0 Post Removal Site Control*

- i. Page 30, Paragraph 1, Bullet 2. The designated "W-3" for monitoring well three should be "MW-3".

3. *Figures.*

- i. Figure 6. The legend of this figure should define each acronym used in the figure.

4. All relevant documents generated during the removal action, including manifests, invoices, contracts and permits mentioned in the consent order dated 20 Nov 1997, real time air monitoring records, instrument calibration logs, compaction test results, tailgate safety meetings records, weekly project meeting records, and monthly progress reports, should be included in the appendixes.

If you have any questions regarding Altech's comments, please contact me at (248) 353-3832.

Sincerely,

Altech Environmental Services, Inc.

A handwritten signature in black ink, appearing to read "Arinze Nwamba". The signature is fluid and cursive, with a period at the end.

Arinze Nwamba
Project Engineer

cc: Lorraine Kosik, U.S. EPA START Project Officer
Tom Kouris, Tetra Tech START Program Manager
David Sawicki, Tetra Tech START Project Manager